

Hearing date: To be set by Court

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of
THE COMMONWEALTH OF PUERTO RICO,
et al.

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

RICOH PUERTO RICO INC.'S
MOTION OBJECTING DOCKET NO. 19353 AND INFORMING CURE AMOUNTS
FOR EXECUTORY CONTRACTS OR UNEXPIRED LEASES TO BE ASSUMED
PURSUANT TO TITLE III PLAN OF ADJUSTMENT

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

TO THE HONORABLE LAURA TAYLOR SWAIN,
UNITED STATES DISTRICT JUDGE:

COMES NOW RICOH PUERTO RICO, INC. (“RICOH PUERTO RICO”), represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. Through motion dated November 23, 2021 (the “Motion”) (Dkt. # 19353) notice was given by the Financial Oversight and Management Board, as sole representative of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority (collectively the “Debtors”) to all affected parties of the executory contracts and unexpired leases to be assumed pursuant to Exhibit E (the “Schedule”) of the Second Amended Plan Supplement and Exhibit A to the Motion.

2. The Motion further informed that the Debtors had conducted a review of their books and records and have determined that the cure amount for unpaid monetary obligations due and/or that could have been sought in accordance with Executory Contracts or the Unexpired Leases is as set forth in Exhibit A to the Motion.

3. The Motion further provided that any interested party disagreeing with the proposed Cure Costs or the assumption of the Executory Contracts or Unexpired Leases affecting such party had to file an objection which, *inter alia*, had to state with specificity the nature of the objection and, if the objection pertains to the proposed Cure Costs, state the correct cure amount alleged to be owed, together with any applicable and appropriate documentation in support thereof.

4. In compliance with the Motion, RICOH PUERTO RICO hereby informs that it hereby objects the proposed Cure Costs contained in Exhibit A to the Motion as it regards its executory contracts or unexpired leases to be assumed by the Debtors.

5. RICOH PUERTO RICO hereby gives notice that the Cure Costs regarding its executory contracts or unexpired leases to be assumed by the Debtors amount to the total sum of

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\$3,773,054.91 (Three Million Seven Hundred SeventyThree Thousand Fifty Four Dollars and Ninety One Cents as of November 30, 2021, as per **Exhibit 1** attached hereto. Such Cure Costs encompass the RICOH PUERTO RICO contracts with the Commonwealth of Puerto Rico and its political subdivisions itemized in **Exhibit 1** attached hereto, and made a part of the instant motion.

6. No prior request for the relief sought herein has been made to this Court or to any other court.

Certificate of Service: Notice has hereby been served by CM/EF and on the Master Service List posted on the website of the Debtors' claims and noticing agent, as may be applicable.

WHEREFORE, RICOH PUERTO RICO, INC. respectfully requests that this Court ALLOW the Cure Costs itemized herein in their entirety, and order the payment of the same as provided for in any confirmed Plan of Adjustment, in order for the proper assumption by the Debtors of the executory contracts or unexpired leases involved, with any other appropriate relief in favor of movant herein.

RESPECTFULLY SUBMITTED.

Dated: December 12, 2021

Respectfully submitted,

REICHARD & ESCALERA, LLC
/s/ Fernando Van Derdys
USDC-PR 201913
fvander@reichardescalera.com
255 Ponce de León Avenue
MCS Plaza, 10th Floor
San Juan, PR 00917-1913
Telephone: (787) 777-8888